

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents  
Registration Act of 1938, as amended.

Budget Base No. 49-0926.5  
Approval Expires Oct. 31, 1976  
SLP 5 52 AM '74  
REGISTRATION UNIT  
INTERNAL SECURITY  
SECTION  
CRIMINAL DIVISION

1. Name of Registrant

George Bronz

2. Registration No.

1740

3. This amendment is filed to accomplish the following indicated purpose or purposes:

☐ To correct a deficiency in

☐ Initial Statement

☐ Supplemental Statement  
for \_\_\_\_\_

☐ To give notice of change in an  
exhibit previously filed.

☐ To give a 10-day notice of a change in infor-  
mation as required by Section 2(b) of the Act.

☒ Other purpose (specify) In response to  
request from Chief, Registration  
Unit

4. If this amendment requires the filing of a document or documents, please list -

Testimony on Behalf of the New Zealand Dairy Board, Presented by  
George Bronz, Attorney, Before the Dairy and Poultry Subcommittee  
of the Committee on Agriculture, U.S. House of Representatives

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

Hearing before Dairy and Poultry Subcommittee, House Committee on  
Agriculture, on H.R. 9419, and related bills, May 14 and 15, 1974.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

George Bronz  
\_\_\_\_\_  
\_\_\_\_\_  
(Notary or other officer)

Subscribed and sworn to before me at District of Columbia

this 4 day of September, 1974

Victoria S. Jones  
(Notary or other officer)

My commission expires 4-30-78

RECEIVED  
DEPARTMENT OF JUSTICE

SERIALIZED MAY 15 1974

REGISTRATION UNIT  
INTERNAL SECURITY  
SECTION  
CRIMINAL DIVISION

TESTIMONY ON BEHALF OF

THE NEW ZEALAND DAIRY BOARD

Presented by

GEORGE BRONZ, ATTORNEY

Before the

DAIRY AND POULTRY SUBCOMMITTEE

of the

COMMITTEE ON AGRICULTURE,

U. S. HOUSE OF REPRESENTATIVES

May 15, 1974

The New Zealand Dairy Board is organized by statute to represent the dairy farmers of New Zealand. It has responsibilities in the administration of the dairy manufacturing industry, and handles the export of manufactured dairy products to world markets. New Zealand is the world's leading exporter of dairy products. The products of New Zealand dairy farms comprise over 30% of New Zealand's export trade. New Zealand is dependent upon export trade to a far greater degree than all but a very few countries in the world.

New Zealand has been an exporter of dairy products for almost a century. The first shipment of refrigerated dairy produce left New Zealand in 1882. The industry has advanced to the point where it is now one of the most efficient and sophisticated in the world. New Zealand adopted a quality control system for its dairy produce in 1894, the first country in the world to do so. Its standards today, from farm to marketplace, are as high as those anywhere in the world.

Under New Zealand legislation, the Dairy Division of the Ministry of Agriculture and Fisheries regulates the production, collection, treatment, and manufacture of milk and dairy products for consumption in New Zealand and for export. The regulations under this legislation provide specific standards for hygiene and plant construction, manufacturing, processing, and wrapping and packing. All dairy produce is inspected and graded by the Dairy Division and must meet the required standards before it may be exported. New Zealand is proud of the quality of the dairy products it sells in about 100 world markets.

New Zealand agriculture is primarily pastoral. Over 80% of the country's export earnings are derived from animal products. The first priority of New Zealand's agricultural and economic policies must necessarily be assigned to the protection of the health of its animals and the quality of its animal products.

The examination of imported dairy products by the Food and Drug Administration has been thorough and stringent. The surprisingly high rejection rates cited by Representative Obey testify to the severity of the inspection standards applied. It must be realized that many of the rejections are not based on defects of healthfulness or quality. Often, it is a question of the wording of the label, which is then corrected, and the goods cleared.

The last rejection of a New Zealand dairy product on a health ground occurred more than five years ago when the Food and Drug inspector discovered a few bags of casein had been damaged in transit. There were also some rejections about four years ago when the Food and Drug Administration changed its mind about the proper name of a cheese; the packages were relabeled and cleared.

In view of this record, the question might be asked why the New Zealand Dairy Board would have any objection to the additional requirements proposed in the bills before this subcommittee. We are confident that New Zealand's standards are as high as any in the world. However, New Zealand dairy produce is now being exported to about 100 different countries of the world. If each country decided that it must send its own inspectors and enforce its own standards on a supplying country, the New Zealand dairy industry would find itself being inspected by 100 different groups of inspectors, each with a somewhat different notion of what the best practices are.

The United States and New Zealand are both agricultural exporting countries. Both share an interest in facilitating international trade in agricultural products and in resisting the proliferation of governmental requirements which obstruct the free flow of trade. A precedent set by the United States in the dairy field might very well prompt other countries of the world to enact similar requirements applicable to United States exports. Indeed, inspection requirements could be devised not only for foods, but also for other agricultural and industrial products. International trade requires a reasonable measure of international confidence in the regulatory machinery of other governments. If every country insists on monitoring every step in the production of products destined for its market, international trade could soon become well nigh impossible.

In the testimony given here yesterday, witness after witness admitted candidly that he was sponsoring these bills as much for trade protective reasons as for reasons of public health. We submit that protectionist objectives have no place in the consideration of the measure before you. The United States, the world's greatest exporting and importing country, and the leader in efforts to achieve good international trade policies, should not be open to the suspicion that it is erecting a trade barrier under the guise of a health measure.

If, however, despite these considerations and those put forward by other witnesses in this hearing, the sub-committee feels that the bills we are discussing should be favorably considered, we must raise another point which we feel would follow logically from the proposal made by Representative Obey. The bills provide that foreign dairy products must comply with the grading and other standards applicable to domestic production. If inspected and found to comply with such standards, we submit that imports should be explicitly authorized to use such American designations as "Grade A," "Extra Grade," and "AA Butter," so that the American consumer will know that the imported product has been inspected and found to be of equivalent quality to domestic produce bearing the same quality designations. In the present complex of regulation in the United States, administered in part by federal and in part by local authorities, imported dairy produce has been denied use of such grade designations, and thereby has been excluded from a number of significant markets. For example, the meat inspection regulations of the Department of Agriculture forbid the use of nonfat dry milk as a sausage ingredient unless manufactured in an approved plant. It should be made clear that if the full scale of American inspection and grading procedures are to be applied to foreign dairy products, such produce should equally qualify as having been produced in an approved plant and therefore be eligible for use in sausage making. Similarly, grade designations such as "Extra Grade Nonfat Dry Milk made from Grade A milk," and "AA Butter" should be permissible for imported and cleared products.

Finally, I submit that the imposition of inspection fees on imported dairy produce, where there is no counterpart fee on domestic produce, would constitute a monetary trade barrier, contrary to the international obligations of the United States. It would not be unreasonable to ask imported products to pay the same fees that domestic products do for voluntary grading, but the importer should not be compelled to pay fees when no similar fees are imposed on domestic producers.